

Abdul Hassan Law Group, PLLC
215-28 Hillside Avenue
Queens Village, New York, 11427

~~~~~

**Abdul K. Hassan, Esq.**  
Email: [abdul@abdulhassan.com](mailto:abdul@abdulhassan.com)  
*Employment and Labor Lawyer*

Tel: 718-740-1000  
Fax: 718-740-2000  
Web: [www.abdulhassan.com](http://www.abdulhassan.com)

**February 24, 2020**

**Via ECF**

Hon. Vernon S. Broderick, USDJ  
United States District Court, SDNY  
40 Foley Square  
New York, NY 10007

APPLICATION GRANTED  
SO ORDERED 

VERNON S. BRODERICK  
U.S.D.J. 3/2/2020

**Re: Rubio v. BSDB Management Inc. et al**  
**Case No. 19-CV-11880 (VSB)(SN)**  
**Motion for Extension of Time**

Dear Judge Broderick:

My firm represents plaintiff in the above-referenced actions, and I respectfully write with the consent of opposing counsel, to request a 30-day extension of the February 24, 2020 deadline for Plaintiff to respond to Defendants' counterclaims. No prior request for an extension of this deadline was made.

We thank the Court in advance for its time and consideration.

Respectfully submitted,

Abdul Hassan Law Group, PLLC

/s/ Abdul Hassan

By: Abdul K. Hassan, Esq.

**cc: Defense Counsel via ECF**